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September 22, 2021

Honorable Judge Brian M. Cogan  
United States District Court Judge  
Eastern District of New York  
225 Cadman Plaza  
Brooklyn, New York 11201

**RE: SENTENCING MEMORANDUM**

**United States v. Joseph Marra**  
**Docket No. 19CR442(S-3)(BMC)**

Dear Judge Cogan,

As you are aware, our offices represent the above referenced individual scheduled for sentencing by the Court on October 6, 2021 at 9:30AM.

On November 17, 2020, Joseph Marra pled guilty before Hon. Magistrate Judge Vera M. Scanlon to a one count Superseding Information. Count 1 charges that between February 2017 and September 2019, Mr. Marra and others engaged in the collection of unlawful debt in connection with a racketeering enterprise in violation of 18 U.S.C. §1962 (c).

With calculated Total Offense Level of 15 and a Criminal History Category of IV, the operative Plea Agreement as well as the United States Probation Department Sentencing Report contain an advisory guideline range of 30 to 37 months.

Consistent with the foregoing, we respectfully request the Court consider the following factors in connection with its fashioning of an appropriate sentence within the aforementioned guideline range.

**(A) Joseph Marra's Post-Offense Rehabilitation and the Onerous Collateral Consequences of His Conviction**

As referenced in the Information, Joseph Marra ceased engaging in the conduct for which he presently stands before this Court in September 2019 – over two (2) years ago.

In the interim period of time, Mr. Marra has paid an onerous cost for the conduct which places him before this Court. His conviction resulted in the loss of his union job along with concomitant forfeiture of his family's health insurance and benefits – both now as well as those anticipated in retirement.

Joseph Marra did however actively seek out and obtain new gainful employment with Nissan of Staten Island. In this capacity, Mr. Marra duties include receiving returned leased vehicles, cleaning them and maintaining accurate inventory of same. His direct supervisor has seized the opportunity to confirm what an asset Mr. Marra has been to the Nissan organization:

*"Few people are fortunate enough to have the chance to work with a Pre Delivery Inspection Manager as outstanding as Joseph Marra. I have had the pleasure of working with Mr. Marra since January of 2020. I was constantly impressed by his exceptional ability to handle a prep department without any setbacks. Over the years of my employment I have not met an employee that has a positive attitude towards work. His interpersonal and communication skills allowed him to develop a productive working relationship with both our clients and our staff."*

*He is very well organized and keeps track of the details necessary to coordinate events of this kind and run an efficient department. I am aware that Mr. Marra has to take a leave of absence to serve time but upon return we would love to have Joseph apart of our team again. With sadness I would like to say we will not be able to replace his devotion to work but in good faith we will await his return with an open job opportunity.”*

(Exhibit A: Vishali Patel)

Joseph Marra has openly accepted responsibility for his actions and stands before this Court with a sincere desire to place his prior unlawful conduct behind him. Indeed, Mr. Marra saved the United States Attorney’s Office considerable time and resources by voluntarily waiving his right to Indictment and opting to instead plead guilty to an Information. He has likewise forfeited the sum of \$43,500 to the Court as part of the instant disposition.

Mr. Marra is now desirous of surrendering to the custody of the Bureau of Prisons, serving his sentence and returning home to resume the rehabilitative path he has already begun undertaking.

**(B) The Abandonment of Joseph Marra’s Family Responsibilities**

Joseph Marra is married Rosemarie Marra (nee Scura). His spouse unfortunately suffers from various mental health conditions including having been prescribed Klonopin to treat panic attacks. She has seized the opportunity to share her sentiments of Joseph Marra with the Court:

*“I am pleading with you to be lenient with my husband. Taking him away from me will be so hard on me I will be so heartbroken. I count on him for so many things,*

*he is the anchor of our family. He is a good person a loving person a great father great grandfather great uncle and a wonderful husband.*

*I have watched this man life change he works from 9-7 5 days a week. Any free time we have we try to go see his Mother that is 86 years old or we spend time with the grandchildren we have 13 grandchildren between the us and we are blessed to have a loving family...*

*My husband is not a young man anymore... Please I know he has to do time but please I'm asking you to not take him away from me for so long."*

(Exhibit B: Rosemarie Marra)

Mr. Marra has three children with whom he has always maintained a close relationship – Christina Marra Sterling, Anthony Marra and Diana Marra. As evidenced by the enclosed correspondence to the Court, Mr. Marra is a doting father, grandfather and husband:

*"Despite my father's history, he is in fact a reformed man. He is a loving and supporting father and grandfather, and we whole heartedly love and adore him. He is not the man he was 20-30 year ago. He is a family man. He is a working man. He is someone we can look up to. He is someone we can always turn to for support and advice. No one is perfect, but he was able to turn his life around and become a better man, and for that I admire and respect him.*

*My father was arrested back in October 2019. Since then, it's been a roller coaster of emotions. I am grateful for the time we have spent together, but I am also scared and worried about his sentencing. The unknown has been a like a constant black cloud hanging over us. I fear that he will be judged on his past and not on the man that he is today. I honestly can't imagine going through this again. I can't imagine my father going through this again at 60 years old. It breaks my heart to think that soon I will be visiting him in a prison, receiving only collect calls, not having him around for holidays and birthdays. I will miss talking to him on his ride home from work while he sits in traffic or looks for parking. I will miss going out for dinners and spending quality time together. I will miss seeing my boys light up when he is around and hearing their cute little voices call out in excitement "Grandpa Joe!"*



*Judge, I beg of you, to please give him a light sentence. I cannot bear the thought of not having my dad around. Even at 37 years old, I still need my father, we all do. Since October 2019, he has been going to work and spending all of his time with his family, including taking care of his elderly mother. He has not been a threat or danger to the community in any shape or form. I ask that you please keep this in mind when sentencing him."*

(Exhibit C -Christina Sterling)

\* \* \* \* \*

*"I write you this letter today to express on a personal level from one person to another the type of man that my father really is...*

*He got himself a great job in the local 282 teamster union. He also got married & maintains such a close relationship with my siblings and I & all of his grandchildren. My point is that my father isn't some monster....*

*My father went to jail and did a 20 year sentence when I was 7 years old and didn't come home until I was 25. Now my sisters and myself have children (his grandchildren) and we want him to make up the time he lost with us with them. He was doing that these past 10 years. Since he's been home we've spent every Thanksgiving & Christmas together...*

*With this pandemic I hear a lot of prisons are dealing with major outbreaks and at 60 years old I don't even feel that's a safe place for him to be.... I have a wife and two kids who adore him. He's a family man. He would always preach to me about how important school was and how important it was to get a good job. He's the type of man who just wanted to see his children do good in life and not repeat any mistakes he may have made...."*

(Exhibit D: Anthony Marra)

\* \* \* \* \*

*"My name is Diana Marra, I am Joseph Marra's youngest daughter. I am 32 years old, I have three beautiful children. I am currently employed with the Department Of Education. I attend Touro College part time earning my bachelor's degree....*

*My father went to prison when I was 5 years old and when he returned I was a mother of two. I didn't get the chance to grow up with my father. I have very few*

*memories with my dad as a kid. The only real memories I have are the ones on a visiting floor. I didn't have my father by my side on the first day of school, I didn't have my father by my side at graduations, I didn't have my father by my side while receiving communion or confirmation, I didn't get to attend daddy daughter dances throughout elementary school. My father missed out on a lot and so did I due to his incarceration. This took a toll on my whole family. My mother was left alone raising three small children. My brother Anthony was very sick at the time. My mother's health wasn't great either, she has multiple sclerosis. There were days she could barely walk.*

*Thankfully through such ugly and difficult circumstances we all made it through and we were lucky enough to welcome my dad back after 18+ years. Of course everything was different! We were no longer babies, we no longer all lived under the same roof, some of us now had children of our own. This was a new start for all of us...I realized it was no longer about me anymore. My time with my father as a little girl was gone and I couldn't get it back. It was no longer about what we missed and what we didn't get to do together. It was now about my kids and what I wanted my kids to have with my father, their grandfather. Which is everything I didn't! It made me so happy to see my father at my kids stepping up ceremonies, their graduations, their band performances, receiving their first holy communion, birthdays my father got to attend it all. This made me so happy! This filled that void I had growing up without him. I got to enjoy it through my children and I am so beyond thankful for that.*

*The thought of him going away now and missing what's to come in the future with my children kills me. My kids love their grandfather. They know him as a hardworking man who gets up every day and goes to work. They know him as the loving caring man he is to his family. My daughter Teresa calls her grandfather almost every day just to talk. I still haven't told my kids that their grandfather will be going away because I know it's going to hurt them. We've all had such a hard year! Covid, schools shutting down, people getting sick, deaths constantly being reported, riots and looting. Every time we turn on the TV it's more bad news and throughout all this we had a heart breaking loss in our family back in February along with a health scare from my father. There has just been too much bad going on around us. Right now we need to all stick together. We need my father around, His wife needs him, his mother needs him, his kids need him and most importantly his grandkids need him.*

*Your honor I know my father has a past we all do. I know people make mistakes but I also know people change.. Your honor I pray you find it in your heart to see the good in my father...."*

(Exhibit E: Diana Marra)

*“I am Joseph Marra’s stepdaughter. I do have a father but I consider Joe truly a part of my family he’s a wonderful person he’s always there when you need him. My children adore him and love him.*

*My stepfather means the world to me I am 38 years old and I just suffered a heart attack he was right there, he’s such a wonderful man to my mother to us he is part of my family....*

*What I can tell you is that my mother is losing health over this she’s heartbroken.”*

(Exhibit F: Danielle Scura)

A Defendant’s familial responsibilities are a necessary and permissible factor in considering leniency in sentencing (see e.g. United States v. Alba, 933 F.2d 1117 (2<sup>nd</sup> Cir. 1991) (*living with dependent relatives*). This philosophy is predicated upon the fact that the “*family circumstances caselaw of this and other circuits recognizes that courts should...attempt to build procedures, dispositions, and structures that foster extended family responsibilities*”. United States v. Rose, 885 F. Supp. 62, 63 (E.D.N.Y. 1995).

Joseph Marra’s wife, children and grandchildren would be the intended beneficiaries of any leniency provided by this Court on family circumstances grounds inasmuch as they are individuals whom the defendant has demonstrated long term devotion and commitments. United States v. Londono, 76 F.3d 33, 36 (2<sup>nd</sup> Cir. 1996) (Court of Appeals recognized that a defendant’s family responsibilities may present such circumstances that leniency is necessary and permissible).

In cases such as this, the reduction of a custodial sentence allows a defendant to continue to discharge his existing family responsibilities and avoids potentially relegating family members to public assistance. See e.g. United States v. Rivera, 994 F.2d 942 (1<sup>st</sup>



Cir. 1993); United States v. Alba, 933 F. 2d 1117 (2<sup>nd</sup> Cir. 1991); United States v. Johnson, 964 F. 2d 124 (2<sup>nd</sup> Cir. 1992). United States v. Cho, No. 08-CR-332, 2009 WL 5322746, at \*2 (E.D.N.Y. Oct. 6, 2009); United States v. Alequin, No. 07-CR-00810, 2008 WL 3009962, \*1-2 (E.D.N.Y. June 16, 2008). Leniency in such instances serves to “*reduce the destructive effects that incarceration of a defendant may have on innocent third parties*”. United States v. Milikowsky, 65 F. 3<sup>rd</sup> 4 (2<sup>nd</sup> Cir. 1995).

As detailed above and in the enclosed, Mr. Marra’s removal from the family unit will terminate the familial responsibilities he has passionately shouldered and, as of the date of this Sentencing Memorandum, continues to diligently discharge.

### **Conclusion**

It has not escaped defense counsel that decisions regarding whether or not individuals should be afforded any leniency in contemporary society are increasingly difficult. However, Joseph Marra is held in high regard by his family, friends as well as peers and possesses numerous positive attributes as referenced above and in the enclosed additional correspondence to the Court (Exhibit G: Catherine Marano).

In light of the above and enclosed, we believe that a sentence within the Department of Probation’s and Plea Agreement’s consensus calculated guideline range of 30 to 37 months along with a recommendation for the Federal Correctional Institute at Fort Dix, New Jersey would be sufficient, but not greater than necessary, to comply with the sentencing purposes set forth in §3553(a)(2). Accordingly, such a sentence would represent a fair and reasonable guideline sentence.



We respectfully submit that a more protracted custodial sentence of this 60 year old defendant would prove unduly harsh and far more harmful than warranted. As an initial matter, Mr. Marra does not stand before the Court convicted of a series of violent racketeering activities but rather a lone count of CUD (Collection of Unlawful Debt) RICO. Moreover, the existing guideline range calculated by the United States Department of Probation as well as the Office of the United States Attorney have already incorporated significant penalties due to both Mr. Marra's earlier criminality (i.e. by way of Criminal History Category enhancements) as well as commission of a portion of the instant offense while serving a term of supervised release. Indeed, these existing circumstances have already served to accelerate Mr. Marra's offense level of 15 from what would have been a low-end guideline sentence of just 18 months to a much more substantial custodial range of 30 to 37 months.

Thank you for your kind consideration in this matter.

Respectfully Submitted,  
*Joseph Mure, Jr.*  
Joseph Mure, Jr., Esq.

cc: A.U.S.A. Elizabeth Geddes, Esq.  
VIA ECF

**EXHIBIT “A”**

# Nissan of Staten Island

*1976 Hylan Blvd.  
Staten Island, New York 10306*

September 21, 2021

Judge Bryan Cogan  
United States Federal Court Eastern District

Re: Joseph Marra

To Judge Bryan Cogan

Few people are fortunate enough to have the chance to work with a Pre Delivery Inspection Manager as outstanding as Joseph Marra. I have had the pleasure of Working with Mr. Marra since January of 2020. I was constantly impressed by his exceptional ability to handle A prep department without any setbacks. Over the years of my employment I have not met an employee that has a positive attitude towards work. His Interpersonal and communication skills allowed him to develop a productive working relationship with both our clients and our staff. He is very well organized and keeps track of the details necessary to coordinate events of this kind and run an efficient department. I am aware that Mr. Marra has to take a Leave of absence to serve time but upon return we would love to have Joseph apart of our team again. With sadness I would like to say we will not be able to replace his devotion to work but in good faith we will await his return with an open job opportunity.

We look forward to continue employment with Mr. Marra. Should you have any questions or concerns please feel free to contact me.

Sincerely

A handwritten signature in black ink, appearing to read 'Vaishali Patel', with a long horizontal flourish extending to the right.

Vaishali Patel  
Controller



**HIGHWAY SAFETY  
PROTECTION CORP**  
- EQUIPMENT RENTALS -

PO BOX 677  
Syosset, NY 11791

February 5, 2021

Hon. Brian M. Cogan  
United States District Court EDNY  
225 Cadman Plaza East  
Brooklyn, New York 11201

RE: Joseph Marra

Dear Judge Cogan,

I am sending this to advise the Court that Joseph Marra was employed by Highway Safety Protection Corp. Throughout his employment Joseph Marra was always punctual, responsible, hard-working, safe, courteous, very professional, never missed work and customers often requested him to be on their team and he always conducted himself in a respectable way. We hope that the Court will take this into consideration.

Please let us know if we can be of further assistance to the Court.

Thank you.

Sincerely yours,

A handwritten signature in black ink, appearing to read 'Catherine Marano', written in a cursive, flowing style.

Catherine Marano  
President  
Highway Safety Protection Corp.



**EXHIBIT “B”**

Dear Judge Brian M. Cogan

Please let me introduce myself my name is Rosemarie Marra, I am married to Joseph Marra I've been his wife for the last five years.

Dear judge I'm asking you I am pleading with you to be lenient with my husband

Taking him away from me will be so hard on me I will be so heartbroken.,

I count on him for so many things., he is the anchor of our family.

He is a good person a loving person a great father great grandfather great uncle and a wonderful husband.

I have watch this man life change he works from 9-7 5days a week., Any free time we have we try to go see his Mother that is 86 years olds or we spend time with the grandchildren that we 13 grandchildren between the us.and we are blessed to have a loving family.

Once Covid was Under control my husband went directly to work he was one of the first guys that called back., he is a valuable asset to the company.

My husband is not a young man anymore., we don't have time to waste a part., I need him by my side , he has suffered so many years of his life.

Please I know he has to do time but please I'm asking you to not take him away from me for so long.

I feel like a selfish person pleading but I'm not only pleading for me and pleading for a whole family.

I'm sure you get a lot of letters like this and you don't know me and you don't know him., you only know this man on paper., Your honor he is not that man that they portray on paper.

I know the decision you have to make is difficult and this is the first time you will be seeing my husband Joseph., But please keep in mind this is not the same person of 40 years ago ., I know i am not the same person 40 years ago.

Thank you for your time , Thank You for taking everything i wrote into consideration.

I hope you can find it in your heart to hear my plea and  
Dear Judge

Thank You  
Rosemarie Marra

**EXHIBIT “C”**



Dear Judge Brian M. Cogan,

My name is Christina Sterling. I am a 37-year-old Registered Nurse, married with two children; Robert age 3 and Michael age 16 months. I hope this letter finds you and your family safe and well during this pandemic. I am writing to you on behalf of my father Joseph Marra.

Despite my father's history, he is in fact a reformed man. He is a loving and supporting father and grandfather, and we whole heartedly love and adore him. He is not the man he was 20-30 year ago. He is a family man. He is a working man. He is someone we can look up to. He is someone we can always turn to for support and advice. No one is perfect, but he was able to turn his life around and become a better man, and for that I admire and respect him.

My father was arrested back in October 2019. Since then, it's been a roller coaster of emotions. I am grateful for the time we have spent together, but I am also scared and worried about his sentencing. The unknown has been a like a constant black cloud hanging over us. I fear that he will be judged on his past and not on the man that he is today. I honestly can't imagine going through this again. I can't imagine my father going through this again at 60 years old. It breaks my heart to think that soon I will be visiting him in a prison, receiving only collect calls, not having him around for holidays and birthdays. I will miss talking to him on his ride home from work while he sits in traffic or looks for parking. I will miss going out for dinners and spending quality time together. I will miss seeing my boys light up when he is around and hearing their cute little voices call out in excitement "Grandpa Joe!"

Judge, I beg of you, to please give him a light sentence. I cannot bear the thought of not having my dad around. Even at 37 years old, I still need my father, we all do. Since October 2019, he has been going to work and spending all of his time with his family, including taking care of his elderly mother. He has not been a threat or danger to the community in any shape or form. I ask that you please keep this in mind when sentencing him.

I thank you for taking the time out to read this letter.

Thank you,

Christina Sterling.

**EXHIBIT “D”**

Your Honorable Judge Brain M.Cogan

I write you this letter today to express on a personal level from one person to another the type of man that my father really is & not the person they make him out to be in the article's that are written about him. Sure my father's history isn't perfect but the crimes he was found guilty of in the past he did his time for. Since he was released 10 years ago he did nothing but turn his life around.

He got himself a great job in the local 282 teamster union. He also got married & maintains such a close relationship with my siblings and I & all of his grandchildren. My point is that my father isn't some monster. All my father did while he was home was work 6 days a week from 4am until 3,4 sometimes 5pm.

The detectives who arrested him obviously knew his schedule because they arrested him while he was leaving for work.

Judge this recent arrest wasn't just him possibly facing some time. This arrest has costed him his job. All of his wedding money was taken right out of his home. He was removed out of the union. How do you want this man to make a living? My father went to jail and did a 20 year sentence when i was 7 years old and didn't come home until i was 25. Now my sisters and myself have children (his grandchildren) and we want him to make up the time he lost with us with them.

He was doing that these past 10 years. Since he's been home we've spent every Thanksgiving & Christmas together. Every year for the superbowl we get together and throw a real nice superbowl party. It's all good things. I just feel at a time like this in this crazy world between Covid & Riots and all the real crazy crime that's going on out there can we just have this man who is approaching 60 years of age try to enjoy his Golden years with his family? Now i understand you may not see it the way i do. It's maybe because like i said his past isn't the greatest but again the man did his time and paid for those mistakes and i strongly believe it's because of his past everything he does is put under this microscope and the articles written about him blow it up and it's made to be something it's not. All i ask is for you to try and show some mercy. The \$50,000 taken from his home, His job being



stripped away from him, the mental trauma his wife and children are undergoing because of all this i feel is enough punishment. With this pandemic i hear a lot of prisons are dealing with major outbreaks and at 60 years old i don't even feel that's a safe place for him to be.

Would house arrest be an option for him? My father is a stand up guy and has taught me to be the same way. I work and take care of my family. I have a wife and two kids who adore him. He's a family man. He would always preach to me about how important school was and how important it was to get a good job. He's the type of man who just wanted to see his children do good in life and not repeat any mistakes he may have made. Making my father proud and having his approval is something i always strived for and i hope i accomplished that. I hope this letter gives you a different point of view and i appreciate you taking the time to read this letter. Thank you!

Thank You.  
Anthony Marra



**EXHIBIT “E”**

Dear Judge Brian M. Cogan,

09/20/2021

Hello, I'd like to start by introducing myself. My name is Diana Marra, I am Joseph Marra's youngest daughter. I am 32 years old, I have three beautiful children. I am currently employed with the Department Of Education. I attend Touro College part time earning my bachelor's degree. I am reaching out in regards to my father Joseph Marra, who I know will be standing before you in the next coming weeks, due to an arrest on October 3rd 2019. I remember the morning I received the phone call from my sister Christina telling me dad has been arrested. I was 4 months pregnant with my youngest daughter. I was getting ready for work and I suddenly felt sick. I instantly started crying! I couldn't even believe my family was about to go through this once again. My father went to prison when I was 5 years old and when he returned I was a mother of two. I didn't get the chance to grow up with my father. I have very few memories with my dad as a kid. The only real memories I have are the ones on a visiting floor. I didn't have my father by my side on the first day of school, I didn't have my father by my side at graduations, I didn't have my father by my side while receiving communion or confirmation, I didn't get to attend daddy daughter dances throughout elementary school. My father missed out on a lot and so did I due to his incarceration. This took a toll on my whole family. My mother was left alone raising three small children. My brother Anthony was very sick at the time. My mothers health wasn't great either, she has multiple sclerosis. There were days she could barely walk. Thankfully through such ugly and difficult circumstances we all made it through and we were lucky enough to welcome my dad back after 18+ years. Of course everything was different! we were no longer babies, we no longer all lived under the same roof, some of us now had children of our own. This was a new start for all of us. A start to make memories, a start to get to know one another outside in the real world, A start to pick up our lives and leave the past behind us. Unfortunately that ended very fast when just a few months later my father was re arrested and sentenced to another 2 years in prison. This was just another setback for our family. When my father was released again for the second time I realized it was no longer about me anymore. My time with my father as a little girl was gone and I couldn't get it back. It was no longer about what we missed and what we didn't get to do together. It was now about my kids and what I wanted my kids to have with my father, their grandfather. Which is everything I didn't! It made me so happy to see my father at my kids stepping up ceremonies, their graduations, their band performances, receiving their first holy communion, birthdays my father got to attend it all. This made me so happy! This filled that void I had growing up without him. I got to enjoy it through my children and I am so beyond thankful for that. The thought of him going away now and missing what's to come in the future with my children kills me. My kids love their grandfather. They know him as a hard working man who gets up everyday and goes to work. They know him as the loving caring man he is to his family. My daughter Teresa calls her grandfather almost everyday just to talk. I still haven't told my kids that their grandfather will be going away because I know it's going to hurt them. We've all had such a hard year! Covid, schools shutting down, people getting sick, deaths constantly being reported, riots and looting. Every time we turn on the TV it's more bad news and throughout all this we had a heart breaking loss in our family back in February along with a health scare from my

father. There has just been too much bad going on around us. Right now we need to all stick together. We need my father around, His wife needs him, his mother needs him, his kids need him and most importantly his grandkids need him. Your honor I know my father has a past we all do. I know people make mistakes but I also know people change. My father is a good guy. He doesn't deserve to be put back in prison. He doesn't deserve to be pulled away from his family. My fathers whole life has been turned upside down ever since he was arrested in 2019. This is unfair to him and his family. Your honor I pray you find it in your heart to see the good in my father. I pray you see past the image that's been created on paperwork. That's not who Joseph Marra is! Unfortunately we've never had luck in these circumstances, but I'm hoping you will be the judge to change that for us. Your honor I hope this letter finds you and your loved ones in good health. Thank you for your time. It's been greatly appreciated.

Sincerely: Diana Marra

**EXHIBIT “F”**



Dear Judge Brian M. Cogan

Dear judge my name is Danielle Scura I am Joseph Marra Stepdaughter daughter., I am hoping that you and your family are in a good way during this terrible covid season we've had.

I would like to talk a little bit about my stepfather Joseph

I do have a father but I consider Joe truly a part of my family he's a wonderful person he's always there when you need him.,

My children adore him., and love him

My stepfather means the world to me I am 38 years old and I just suffered a heart attack he was right there ., he's such a wonderful man to my mother to us he is part of my family please I'm asking for you to be a little more compassionate with him.

My stepfather has suffered with a lot of pain in his life., he truly is a good person He will rebuilt His life he had a good job he lost everything over nonsense because that's the only way we can explain it.

What I can tell you is that my mother is losing health over this she's heartbroken . He is 60 years old not in the best of Health but he doesn't complain and pushes on.

I truly hope you can find it in your heart to be lenient with Joe this does not deserve . He's had a bad past and he's paid for his past very dearly 20 years.

We all love him and we need him to be here please judge only you have the power to make this really happen thank you .

Your truly Danielle Scura .